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December 8, 2022

VIA E-MAIL

Hon. Lorna G. Schofield
U.S. District Court, Southern District of
New York
40 Foley Square, Courtroom 1106
New York, New York 10007

Re: *loanDepot.com, LLC v. CrossCountry Mortgage, LLC, et al.*, No. 1:22-cv-05971-LGS
Joint Status Letter

Dear Judge Schofield:

Pursuant to the September 1, 2022 Case Management Plan and Scheduling Order (ECF No. 80), the Parties submit this joint status letter.

Substitution of Counsel: As Your Honor is aware, Littler Mendelson, P.C. (“Littler”) replaced Kirkland & Ellis, LLP as Plaintiff’s counsel in this litigation. (See ECF No. 184).

Discovery Disputes: The Parties continue to meet and confer regarding their respective objections to discovery requests propounded by each of the Parties. The Parties conferred on November 8, 2022, concerning CrossCountry’s discovery requests. loanDepot served a letter on CrossCountry on December 6, 2022, about CrossCountry’s objections to loanDepot’s discovery requests. Counsel for all Parties conferred most recently on December 7, 2022, and will confer again on December 14, 2022.

Expedited Discovery: As reported in the Parties’ November 8, 2022 status letter to the Court (ECF No. 158), each of the Parties has made an initial production of documents responsive to expedited discovery requests. Plaintiff, Defendant CrossCountry, and the 13 newly added Individual Defendants expect to make supplemental productions of documents before the end of this month.

Preliminary Injunction Briefing Schedule: Given the substitution of counsel, filed only a week ago, Plaintiff respectfully requests that the Court extend the deadline for Plaintiff to file its motion for preliminary injunction, and adopt the schedule previously proposed by the Parties in their November 15, 2022 joint letter to the Court (ECF No. 173):

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Opening Brief:	February 14, 2023
Opposition Briefs:	March 7, 2023
Reply Briefs:	March 21, 2023

The reason for this request is that Plaintiff's counsel requires this short extension of time in order to familiarize itself with the case, review the evidentiary material exchanged, and fully transition this matter from prior counsel. In addition, all of Plaintiff's attorneys of record will be out of the office in the week immediately preceding the current January 18, 2023 deadline, on previously scheduled travel arranged in connection with Littler's Shareholder Retreat, during which undersigned counsel are expected to attend to firm business, as well as long-standing and previously scheduled family vacations. The short extension to file the preliminary injunction opening brief would be much appreciated given counsel's previously scheduled travel arrangements. CrossCountry and Individual Defendants do not oppose this request.

The Parties appreciate the Court's attention to this matter.

Sincerely,

/s/ Jessica F. Pizzutelli

Jessica F. Pizzutelli

cc: All Counsel of Record